

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION

NIYA HARRIS

PLAINTIFF

VS.

CIVIL ACTION NO.: 4:10CV00080-WAP-DAS

GREENVILLE RIVERBOAT, LLC;
TROPICANA ENTERTAINMENT, LLC;
AND CALVIN BROWN

DEFENDANTS

**JOINT MOTION
FOR ADDITIONAL TIME TO RESPOND TO DISCOVERY REQUESTS**

COME NOW Defendants, Greenville Riverboat, LLC, Tropicana Entertainment, LLC, and Calvin Brown (hereinafter “Defendants”) and Plaintiff, Niya Harris, and file this Joint Motion for Additional Time to Respond to First Sets of Interrogatories and First Requests for Production of Documents. In support of this motion, the parties would show unto this Court the following:

1. The Plaintiff’s First Set of Interrogatories and First Request for Production of Documents were propounded on Greenville Riverboat and received by the Defendants on or around December 6, 2010.
2. Pursuant to the Federal Rules of Civil Procedure, the current deadline for responding to the above-referenced discovery requests is January 6, 2011.
3. The Defendants’ First Set of Interrogatories and First Request for Production of Documents were served on the Plaintiff on or around December 14, 2010.
4. Pursuant to the Federal Rules of Civil Procedure, the current deadline for responding to the above-referenced discovery requests is January 18, 2010.

5. Both parties are in need of additional time to compile the necessary information and documentation to provide full and complete responses to each others' discovery requests.

6. Undersigned is pleased to inform the Court that they have conferred and have agreed to an extension of the response deadlines by (14) days, thereby imposing the following new deadlines: Thursday, January 20, 2011, in which Defendants will respond to Plaintiff's currently pending discovery requests and Tuesday, February 1, 2011, in which Plaintiff will respond to Defendants' currently pending discovery requests.

7. The motion for additional time is not for purposes of delay or otherwise improper under the rules. Rather, the sole purpose of the motion is to insure that the parties can respond fully and completely to the propounded discovery requests.

WHEREFORE, PREMISES CONSIDERED, the parties respectfully request that this Court grant their Joint Motion for Additional Time, and allow Defendants until January 21, 2011 in which to respond to Plaintiff's discovery requests and the Plaintiff until February 1, 2011 in which to respond to Defendants' discovery requests.

RESPECTFULLY SUBMITTED,

/s/ Herbert C. Ehrhardt

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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I, the undersigned counsel, certify that I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

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ATTORNEY FOR PLAINTIFF

On this the 5th day of January, 2011.

/s/ Herbert C. Ehrhardt
HERBERT C. EHRHARDT

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